



WWW.RIVKINRADLER.COM

926 RXR Plaza
Uniondale, NY 11556-0926
T 516.357.3000 F 516.357.3333

MICHAEL P. VERSICHELLI

PARTNER

(516) 357-3431
michael.versichelli@rivkin.com

April 27, 2020

VIA ECF

Honorable Philip M. Halpern
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dana Stephenson v. Exclusive Motor-Sports LLC, Exclusive Motor Sports & Collision Center LLC, Exclusive Motor Cars LLC and Bethpage Federal Credit Union*
Docket No. 7:20-cv-01332-NSR

Dear Judge Halpern:

I write on behalf of Bethpage Federal Credit Union ("BFCU"), a Defendant in the above-referenced matter, to respectfully request an extension of BFCU's deadline to answer, move, or otherwise respond to the Complaint in this action until June 1, 2020.

The current deadline for BFCU to respond to the Complaint was March 24, 2020. However, due to difficulties caused by the COVID-19 Pandemic and ongoing efforts to resolve this matter, BFCU did not previously file a request for an extension. BFCU had, however, secured an informal extension from Plaintiff's counsel in the interim.

This is BFCU's first request for an extension in this matter. The reason for the request is to allow BFCU additional time, during this public health crisis, to investigate the allegations in Plaintiff's Complaint and potentially resolve this matter. Plaintiff consents to BFCU's request.

There are presently no scheduled dates in this matter that will be affected by an extension.

The Court's attention to this matter is greatly appreciated.

Very truly yours,

RIVKIN RADLER LLP

/s/ Michael P. Versichelli
Michael P. Versichelli

mpv

cc: All counsel of record (via ECF)

66 South Pearl Street, 11th Floor
Albany, NY 12207-1533
T 518.462.3000 F 518.462.4199

25 Main Street
Court Plaza North, Suite 501
Hackensack, NJ 07601-7082
T 201.287.2460 F 201.489.0495

477 Madison Avenue
New York, NY 10022-5843
T 212.455.9555 F 212.687.9044

2649 South Road
Poughkeepsie, NY 12601-6843
T 845.473.8100 F 845.473.8777